

Commonwealth of Kentucky
Natural Resources and Environmental Protection Cabinet
Department for Environmental Protection
Division for Air Quality
803 Schenkel Lane
Frankfort, Kentucky 40601
(502) 573-3382

AIR QUALITY PERMIT

Permittee Name: CPS Corporation
Mailing Address: 1715 Columbia Highway, Franklin, TN, 37064

is authorized to operate rotogravure presses for flexible packaging manufacturing

Source Name: CPS Corporation
Mailing Address: 701 Pennel Street
Henderson, Kentucky, 42420
Source Location: 701 Pennel Street, Henderson

Permit Type: Federally-Enforceable Part 70
Review Type: Title V, Synthetic Minor

Permit Number: V-98-016
Log Number: F480
Application
Complete Date: February 13, 1998

KYEIS ID #: 077-1760-0094
AFS Plant ID #: 21-101-00094
SIC Code: 2754

Region: Owensboro
County: Henderson

Issuance Date: October 6, 1998
Expiration Date: October 6, 2003

John E. Hornback, Director
Division for Air Quality

TABLE OF CONTENTS

<u>SECTION</u>		<u>DATE OF ISSUANCE</u>	<u>PAGE</u>
SECTION A	PERMIT AUTHORIZATION	October 6, 1998	1
SECTION B	EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS	October 6, 1998	2
SECTION C	INSIGNIFICANT ACTIVITIES	October 6, 1998	13
SECTION D	SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS	October 6, 1998	13
SECTION E	SOURCE CONTROL EQUIPMENT OPERATING REQUIREMENTS	October 6, 1998	14
SECTION F	MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS	October 6, 1998	15
SECTION G	GENERAL CONDITIONS	October 6, 1998	17
SECTION H	ALTERNATE OPERATING SCENARIOS	N/A	21
SECTION I	COMPLIANCE SCHEDULE	N/A	21

SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application which was determined to be complete on February 13, 1998, the Kentucky Division for Air Quality hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This proposed permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto and shall become the final permit unless the US E.P.A. files an objection pursuant to Regulation 401 KAR 50:035, Section 21(3).

The permittee shall not construct, reconstruct, or modify any affected facilities without first having submitted a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in the Regulation 401 KAR 50:035, Permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Cabinet or any other federal, state, or local agency.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

EP07 (B1)

Description:

EP07 is a Cleaver Brooks CB-700-750 14.645 MM Btu/hr Boiler

Natural gas is burned to produce space heat and to dry applied ink

The boiler is vented to a 30 ft stack

EP07 construction commenced: 1990

EIS #	CPS EP	Description	Max Heat Input Rating (MM Btu/hr)	Pollutant	Applicable Regulation	Allowable (lbs/MM Btu actual heat input)	Potential Emissions (Tons/yr)
07	B1	Boiler	14.645	SO ₂	59:015	See Emission Limitations Section for this EP	0.038
				NO _x			8.980
				CO			2.245
				TSP/PM ₁₀	59:015		0.898
				THC			0.372
				VOC			0.179

APPLICABLE REGULATIONS:

Regulation **401 KAR 59:015**, New indirect heat exchangers, applicable to affected facilities with a capacity of 250 million BTU per hour heat input or less commenced after August 9, 1972, limits particulate and sulfur dioxide emissions.

Regulation **401 KAR 59:005**, General provisions, provides for the establishment of monitoring requirements, performance testing requirements, and other general provisions as related to new sources effective December 1, 1982.

Regulation **401 KAR 60:043**, Standards of performance for small industrial-commercial-institutional steam generating units, applies to each steam generating unit commenced after June 9, 1989 that has a maximum design heat input capacity between 10 MM Btu/hr and 100 MM Btu/hr. The standard of performance is governed by **40 CFR 60, Subpart Dc**.

Operating Limitations:

To satisfy monitoring requirements of 40 CFR 70.6, the following limits will apply.

1. Only pipeline grade natural gas shall be burned.
2. Proper maintenance shall be practiced.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Emission Limitations:****401 KAR 59:015**

The following emission limitations will apply unless the permittee petitions the Cabinet for alternative emission limitations according to Section 3(3) of the above listed regulation.

1. Section 4(1)(c) limits emissions of **particulate matter** to no more than 0.5119 lbs/MM Btu actual heat input.

Note: The limit is determined by substituting the maximum heat input rating for all indirect heat exchangers greater than or equal to 1 MM Btu/hr heat input capacity at the source (14.645) into the following equation.

$$PM = 0.9634 \times (\text{total heat input capacity in MM Btu/hr})^{-0.2356}$$

2. Section 4(2) limits visible emissions to a maximum of **20% opacity** except for emissions occurring during cleaning of the fire box, blowing of soot, and building of a new fire.
 - a. While cleaning of the fire box or blowing of soot is being done, visible emissions are limited to a maximum of 40% opacity for not more than 6 consecutive minutes in any 60 consecutive minutes.
 - b. There is no limit to visible emissions opacity while building a new fire provided a manufacturer recommended method is used and the manufacturer recommended time frame for bringing the boiler up to operating conditions is not exceeded.
3. Section 5(1)(c) limits emissions of any gas which contains **sulfur dioxide** to no more than 2.565 lbs/MM Btu actual heat input.

Note: The limit is determined by substituting the maximum heat input rating for all indirect heat exchangers greater than or equal to 1 MM Btu/hr heat input capacity at the source (14.645) into the following equation.

$$SO_2 = 7.7223 \times (\text{total heat input capacity in MM Btu/hr})^{-0.4106}$$

Testing Requirements:**401 KAR 59:005**

Indirect heat exchangers with 250 MM Btu heat input per hour or less are exempted from performance tests as provided in Section 2(1)(b). Since EP07 has a heat input capacity of only 14.645 MM Btu per hour, this affected facility has no testing requirements.

Specific Monitoring Requirements:

See Operating Limitations #1 and #2 and Specific Recordkeeping Requirements #2, #3, and #4.

Specific Recordkeeping Requirements:

1. **40 CFR 60.48c(g)** requires the permittee to record and maintain records of the amount of fuel combusted each day.
To demonstrate compliance with Operating Limit #1,
 2. A record of the type of fuel burned shall be maintained.
To demonstrate compliance with Operating Limit #2,
 3. All operating procedures shall be recorded,
- and
4. All maintenance procedures and performance shall be recorded.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Specific Reporting Requirements:

401 KAR 59:005

Section 3(1)(d) requires written notification of any physical or operational change which may increase the emission rate of any air pollutant to which a standard applies to be furnished to the Cabinet. This notice shall be postmarked 60 days before the change is commenced or as soon as practicable. The notice shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. Additionally, the Cabinet may request supplementary relevant information.

Specific Control Equipment Operating Conditions:

N/A

Alternate Operating Scenarios:

N/A

Compliance Schedule:

N/A

Compliance Certification Requirements:

Refer to Item 7 of Section F.

SECTION B - EMISSION POINTS, AFFECTED FACILITIES, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**EP01 (A5, A6, C1, C2, and C3)****Description:**

A5 is a 5 station Albert Franklin Rotogravure Model Fab. # 29650 Printing Press

A6 is a 6 station Albert Franklin Rotogravure Model Fab. # 29650 Printing Press

C1 and C2 are 4 station Cerutti Rotogravure Model # PB20/D Printing Presses

C3 is a 4 station Cerutti Rotogravure Model CPS Corp. # 1548 Printing Press

The Albert presses are vented to a single 40 ft stack, run at 300 ft/min, use 40 in wide cylinders, and are designed for a maximum ink usage rate of 8.90 gal/hr

The Cerutti presses are each vented to a 40 ft stack, run at 600 ft/min, also use 40 in wide cylinders, and are designed for a maximum ink usage rate of 17.80 gal/hr

After ink is applied at each station, it is dried at between 150° F and 200° F

These presses have no physical control equipment for pollution reduction

A5 and A6 construction commenced: 1980

A5 and A6 were modified to use only waterborne inks: 1983

C1 and C2 construction commenced: 1990

C3 construction commenced: 1991

CPS EP	Description	Max Design Rating (Gal/Hr)	Pollutant	Applicable Regulations	Allowable (Tons/Year)	Uncontrolled PTE (Tons/Year)
A5	Albert Printing Press #1	8.90	THC/VOC	401 KAR 59:212	Part of Synthetic Minor	68.0
A6	Albert Printing Press #2	8.90	THC/VOC	401 KAR 59:212	Part of Synthetic Minor	68.0
C1	Cerutti Printing Press #1	17.80	THC/VOC	401 KAR 59:212	Part of Synthetic Minor	135.4
C2	Cerutti Printing Press #2	17.80	THC/VOC	401 KAR 59:212	Part of Synthetic Minor	135.4
C3	Cerutti Printing Press #3	17.80	THC/VOC	401 KAR 59:212	Part of Synthetic Minor	135.4
	Plantwide	71.20	THC/VOC HAP	Synthetic Minor 40 CFR 63 KK	* !	N/A 77.5
* See Emission Limitations Section for this EP ! See Operating Limitation #6 for the EP			Pollutant	Applicable Regulations	Allowable (Lbs/Hr)	Worst Case PTE (Lbs/Hr)
			Ammonia	401 KAR 63:022	*	1.42
			Isobutyl Alcohol	401 KAR 63:022	*	29.71
			Monoethanolamine	401 KAR 63:022	*	4.01

APPLICABLE REGULATIONS:

Regulation **401 KAR 59:212**, New graphic arts facilities using rotogravure and flexography, exempts each affected facility in a county designated attainment commenced after Feb. 4, 1981 but prior to June 24, 1992 except that control devices and procedures required at the time the facility commenced shall continue to be operated and maintained.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**APPLICABLE REGULATIONS (CONTINUED):**

Regulation **401 KAR 59:005**, General provisions, provides for the establishment of monitoring requirements, performance testing requirements, and other general provisions as related to new sources effective December 1, 1982.

Regulation **40 CFR Part 63, Subpart KK**, National emission standards for the Printing and Publishing Industry, applies to each new and existing product and packaging rotogravure facility that is a major source of hazardous air pollutants (HAPs) and must be complied with on and after May 30, 1999.

State-Origin Applicable Regulations:

Regulation **401 KAR 63:022**, New or modified sources emitting toxic air pollutants, applicable to each affected facility commenced on or after November 11, 1986.

Operating Limitations:**401 KAR 59:212**

For this facility, Section 2(2) requires controls (that were required at the time of construction or modification) to be maintained. The permittee was and shall continue to be required to control VOC emissions through the use of inks with the following specifications.

1. Waterborne inks whose volatile portion (water and VOC) consists of 25 percent or less (by volume) VOC shall be utilized in all printing units,
- or 2. Inks which, excluding water, contain 60 percent or more (by volume) non-volatile material as applied to the substrate shall be utilized.

Note: All other methods of complying with the controls required by Section 2(2) would require a modification to the affected facilities and a new permit to be issued.

Compliance Demonstration Method:

If deemed necessary, the Cabinet shall obtain samples of the inks used at an affected facility to verify that the inks meet these requirements.

Records of ink composition may also be used (this method shall not be used to replace sampling). To verify Operating Limitation #1, the following formulas may be used.

Information available through MSDS, Chemical Dictionary, or Breakdown Report:

Density of the ink:	$D_i = \text{lbs of ink/gal of ink}$
Weighted average density of the VOCs in the ink:	$D_v = \text{lbs of VOC/gal of VOC}$
Percentage of solids (by weight) in the ink:	$\%S = 100 \times \text{lbs of solids/lb of ink}$
Percentage of water (by weight) in the ink:	$\%W = 100 \times \text{lbs of water/lb of ink}$
Percentage of VOCs (by weight) in the ink:	$\%V = 100 \times \text{lbs of VOC/lb of ink}$

Known:

Density of water = 8.34 lbs/gal

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Operating Limitations #1 and #2 (Continued):

Compliance Demonstration Method (Continued):

$$\text{Ratio for Volume of VOC to Volume of Ink} = (\%V \times D_i)/(D_v \times 100)$$

$$\text{Ratio for Volume of Water to Volume of Ink} = (\%W \times D_i)/(8.34 \times 100)$$

$$\% \text{ VOC (by volume) of volatile portion} = 100 \times \text{Ratio for Volume of VOC to Volume of Ink} / (\text{Ratio for Volume of Water to Volume of Ink} + \text{Ratio for Volume of VOC to Volume of Ink})$$

To verify Operating Limitation #2, use the givens and knowns above in the following formulas to determine the percentage of non-volatile material in the ink excluding water.

Since the inks are only composed of solids, water, and VOC, the following equation is true.

$$\frac{\text{Volume of VOC}}{\text{Volume of Ink}} + \frac{\text{Volume of Water}}{\text{Volume of Ink}} + \frac{\text{Volume of Solids}}{\text{Volume of Ink}} = 1$$

By rearranging this equation, the Ratio for Volume of Solids to Volume of Ink can be found.

$$\text{Ratio for Volume of Solids to Volume of Ink} = 1 - \text{Ratio for Volume of VOC to Volume of Ink} - \text{Ratio for Volume of Water to Volume of Ink}$$

$$\% \text{ non-volatile (by volume) material in ink excluding water} = 100 \times \text{Ratio for Volume of Solids to Volume of Ink} / (\text{Ratio for Volume of VOC to Volume of Ink} + \text{Ratio for Volume of Solids to Volume of Ink})$$

Operating Limitations:

PSD Synthetic Minor Limitations

The following restriction shall be used to limit potential to emit as required to make Emission Limitation #1 enforceable.

3. Total VOCs used during any consecutive 52 week period shall not exceed 466,000 lbs (this includes VOCs in inks, solvents, and cleaning solutions).

Compliance Demonstration Method:

Operating Limitation #3

The following formula shall be used to determine VOC usage.

$$\begin{aligned} \text{VOC use (lbs)} = & \sum [\text{gallons of ink} \times \text{VOC content of ink (lbs/gal)}] \\ & + \sum [\text{gallons of solvent} \times \text{VOC content of solvent (lbs/gal)}] \\ & + \sum [\text{gallons of cleaning solution} \times \text{VOC content of cleaning solution (lbs/gal)}] \end{aligned}$$

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Operating Limitations (Continued):

40 CFR Part 63, Subpart KK condition 63.825(b)

4. No more than 4% of the mass of all materials applied during a month to the substrate (inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied to the substrate) shall be organic HAPs starting no later than May 30, 1999.

Compliance Demonstration Method:

The source has chosen to demonstrate compliance by using only materials that have no more than 4%, by weight, organic HAP content (as-purchased).

401 KAR 63:022

5. In order to comply with Emission Limitation #2 and to avoid more detailed recordkeeping requirements, the following limits have been established.
 - a. Ammonia content of all inks used shall be no greater than 0.17 lbs/gal.
 - b. Solvents and cleaning solutions shall contain no ammonia.
 - c. Isobutyl alcohol content of all inks, solvents, and cleaning solutions used shall be no greater than 7.00 lbs/gal.
 - d. Monoethanolamine content of all inks used shall be no greater than 0.45 lbs/gal.
 - e. Monoethanolamine content of all cleaning solutions used shall be no greater than 0.15 lbs/gal.
 - f. Solvents shall contain no monoethanolamine.

Compliance Demonstration Method:

If deemed necessary, the Cabinet shall obtain samples of the inks used at an affected facility to verify that the inks meet these requirements.

Records of ink composition may also be used (this method shall not be used to replace sampling). All inks used by the permittee can demonstrate content through the use of MSDS information. If MSDS claims Hazardous Components are a trade secret, then some other form of documentation will be needed to demonstrate content.

Emission Limitations:

The source has voluntarily accepted **PSD synthetic minor limitations**.

1. VOC emissions shall be limited to 233 tons per year as demonstrated on a weekly basis. Compliance with annual emissions and processing limitations imposed pursuant to 401 KAR 50:035, Section 7(1)(a), and contained in this permit, shall be based on emissions and processing rates for any fifty-two (52) consecutive weeks.

Compliance Demonstration Method:

All VOC content of each ink, solvent, or cleaning solution shall be assumed to be emitted. The following formula shall be used to determine emissions on each press unless an equivalent or superior demonstration method is approved by the Division for Air Quality.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Emission Limitation #1 (Continued):****Compliance Demonstration Method (Continued):**

$$\begin{aligned} \text{VOC emitted (lbs)} = & \sum [\text{gallons of ink} \times \text{VOC content of ink (lbs/gal)}] \\ & + \sum [\text{gallons of solvent} \times \text{VOC content of solvent (lbs/gal)}] \\ & + \sum [\text{gallons of cleaning solution} \times \text{VOC content of cleaning solution (lbs/gal)}] \end{aligned}$$

401 KAR 63:022

2. Section 3(1) limits toxic air pollutant emissions.

- a. Ammonia emissions shall not exceed 26.46 lbs/hr.
- b. Isobutyl alcohol emissions shall not exceed 874.35 lbs/hr.
- c. Monoethanolamine emissions shall not exceed 33.19 lbs/hr.

Compliance Demonstration Method:

By using design capacities and Operating Limitations #5 a, b, c, d, e, and f, a worst case scenario mass balance can be used to demonstrate compliance.

Testing Requirements:

40 CFR Part 63, Subpart KK condition 63.827(b)(2)(I)

All materials required to contain no more than 4% organic HAPs by weight shall be

1. Tested in accordance with Method 311 of 40 CFR 63 in Appendix A to determine organic HAP content by either the manufacturer of the product, or by the permittee,
- or, **40 CFR Part 63, Subpart KK** condition 63.827(b)(2)(iii),
2. The permittee may rely on certified product data sheets if all organic HAPs present at a level greater than 0.1%, by weight, are included in the data sheets.

Specific Monitoring Requirements:

N/A

Specific Recordkeeping Requirements:**401 KAR 59:212**

As part of the control procedures required at the time previous permits were issued, compliance shall be shown by appropriate methods. As part of the permittee's demonstration of compliance, the following items shall be recorded and maintained for 5 years.

1. Specific physical properties and composition of each ink applied (if inks are blended together and used, the mixture shall be exempt from this requirement since the composition of the individual inks in the blend have already been recorded)
 - a. Some form of identification for the ink (used for reference purposes)
 - b. Description of the ink (used for reference purposes)
 - c. Density of the ink
 - d. Some form of information which can be used for easily determining average density of the VOCs in the ink (MSDS information with list of hazardous ingredients and percentage of each VOC will satisfy this requirement)
 - e. Percentage of solids (by weight) in the ink
 - f. Percentage of water (by weight) in the ink
 - g. Percentage of VOCs (by weight) in the ink
 - h. Percentage of VOCs (by volume) in the volatile portion (water and VOC) of the ink

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Specific Recordkeeping Requirement #1 (Continued):**

If the percentage of VOCs (by volume) in the volatile portion is greater than 25%, then the following will also be required to be recorded.

- i. The volume of ink receiving solvent
- j. The volume (less than a certain volume may also be acceptable if volume does not cause the ink, as applied, to violate Operating Limitation #2) and composition of solvents added to the ink

PSD synthetic minor limitations require the following to be recorded. These records shall be retained as required by other applicable regulations and as support information in accordance with Items 2 and 3 of Section F in this permit.

2. Gallons of each ink used weekly and VOC content (mass/volume) of each ink
3. Gallons of solvent added to the presses per week and VOC content
4. Gallons of cleaning solution used per week and VOC content

40 CFR Part 63, Subpart KK

All data required to demonstrate compliance with this regulation (including all reports and notifications) shall be maintained at the source for at least 5 years following the date of the data acquisition or the date of the report (whichever applies) in a form suitable and readily available for expeditious inspection and review.

40 CFR 63.829 also requires Recordkeeping Requirements #2 and #3 from this section of the permit.

5. HAP content and density of each ink and solvent used shall be recorded on a monthly basis starting no later than May 30, 1999.

401 KAR 63:022

Section 3(5) of this regulation also requires gallons of ink, solvent, and cleaning solution used to be recorded. These conditions have already been required by Recordkeeping Requirements #2, #3, and #4 from this section of the permit.

Specific Reporting Requirements:**401 KAR 59:005**

Section 3(1)(d) requires written notification of any physical or operational change which may increase the emission rate of any air pollutant to which a standard applies to be furnished to the Cabinet. This notice shall be postmarked 60 days before the change is commenced or as soon as practicable. The notice shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. Additionally, the Cabinet may request supplementary relevant information.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Specific Reporting Requirements (Continued):**

PSD synthetic minor limitations require the following to be reported on a monthly basis (any partial weeks may be reported on the following month). These reports shall be certified by a responsible official, and delivered or postmarked to the Division's Owensboro Regional Office within fifteen days following the end of the month. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate, and complete.

1. Gallons of each ink used weekly and VOC content (mass/volume) of each ink
2. Gallons of solvent added to the presses per week and VOC content (total consumption)
3. Gallons of cleaning solution used per week and VOC content
4. Total VOC used during any new consecutive 52 week period resulting during the month
5. Because of taking synthetic minor status, some estimate of previous emissions is also required in order to weekly demonstrate compliance with the 233 ton per year emission limit. The estimate shall be furnished by the permittee since **permit O-91-094** (the operating permit which is effective until issuance of this permit) required production records to be maintained. The estimate shall take the form of a summary of total VOC emitted (as determined by the formula given in the Compliance Demonstration Method for Emission Limitation #1) weekly. The summary shall represent VOC emissions for the the period starting October 5, 1997 and continuing to the date of issuance for this permit. This summary shall be prepared and reported no later than December 1, 1998. If the records have not been kept on a weekly basis, then the time period used for recordkeeping may be converted to a weekly record through averaging (for this initial year emission reporting requirement only).

Clear reports similar to the example on the next page will satisfy reporting requirements 1-4.

Monthly reports for organic HAP emissions and semiannual reports of exceedances required by Specific Reporting Requirement #7 shall also be certified by a responsible official, and delivered or postmarked to the Division's Owensboro Regional Office within fifteen days following the end of the month. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate, and complete. The reports for monthly organic HAP emissions should show the summarized monthly and 12 consecutive month total individual and combination HAPs in addition to Specific Reporting Requirement #6.

40 CFR Part 63, Subpart KK condition 63.830(b)(3)

6. The organic HAP content (as-purchased) of all materials applied to the substrate during a month shall be reported monthly starting no later than May 30, 1999.

40 CFR Part 63, Subpart KK condition 63.830(b)(6)

7. The permittee shall also submit a report, starting no later than May 30, 1999, of Operating Limit #4 exceedances once every 6 months to the Division's Owensboro Regional Office. If no such exceedance occurs during the six month period, a report stating this shall be submitted.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Item	Week of Jan 1 - Jan 7		
	Amount Used (Gallons)	VOC Content (Lbs/gal)	Total VOC Used (Lbs)
Ink			
Ink A	A1	A2	$V1=A1 \times A2$
Ink B	B1	B2	$V2=B1 \times B2$
...			...
Solvent			
Solvent C	C1	C2	$V3=C1 \times C2$
...			...
Cleaning Solution			
Ink Demon	D1	0.15	$V4=D1 \times 0.15$
Gem Industrial Wash	F1	F2	$V5=F1 \times F2$
Week 1 Total			=sum (V)
Total of Previous 51 Weeks			=sum (past 51 V)
Total of last year			=sum (V) + sum (past 51 V)
Item	Week of Jan 8 - Jan 14		
	Amount Used (Gallons)	VOC Content (Lbs/gal)	Total VOC Used (Lbs)
Ink			
Ink A	A3	A4	$V10=A3 \times A4$
Ink G	G1	G2	$V11=G1 \times G2$
...			...
Solvent			
Solvent C	C3	C4	$V12=C3 \times C4$
...			...
Cleaning Solution			
Ink Demon	D2	0.15	$V13=D2 \times 0.15$
Gem Industrial Wash	F3	F4	$V14=F3 \times F4$
Week 2 Total			=sum (V)
Total of Previous 51 Weeks			=sum (past 51 V)
Total of last year			=sum (V) + sum (past 51 V)

Specific Control Equipment Operating Conditions:

N/A

Alternate Operating Scenarios:

N/A

Compliance Schedule:

N/A

Compliance Certification Requirements:

Refer to Item 7 of Section F.

SECTION C - INSIGNIFICANT ACTIVITIES

N/A

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

N/A

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS

1. Pursuant to 401 KAR 50:055, Section 2(5), at all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS

1. When continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include:
 - a. Date, place as defined in this permit, and time of sampling or measurements.
 - b. Analyses performance dates;
 - c. Company or entity that performed analyses;
 - d. Analytical techniques or methods used;
 - e. Analyses results; and
 - f. Operating conditions during time of sampling or measurement;
2. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all recordkeeping requirements and reports required by the Division for Air Quality, shall be retained at the source authorized by this permit for a period of five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality.
3. The permittee shall allow the Cabinet or authorized representatives to perform the following:
 - a. Enter upon the premises where a source is located or emissions-related activity is conducted, or where records are kept;
 - b. Have access to and copy, at reasonable times, any records required by the permit:
 - i. During normal office hours, and
 - ii. During periods of emergency when prompt access to records is essential to proper assessment by the Cabinet;
 - c. Inspect, at reasonable times, any facilities, equipment (including monitoring and pollution control equipment), practices, or operations required by the permit. Reasonable times shall include, but are not limited to the following:
 - i. During all hours of operation at the source,
 - ii. For all sources operated intermittently, during all hours of operation at the source and the hours between 8:00 a.m. and 4:30 p.m., Monday through Friday, excluding holidays, and
 - iii. During an emergency; and
 - d. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements. Reasonable times shall include, but are not limited to the following:
 - i. During all hours of operation at the source,
 - ii. For all sources operated intermittently, during all hours of operation at the source and the hours between 8:00 a.m. and 4:30 p.m., Monday through Friday, excluding holidays, and
 - iii. During an emergency.
4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

5. Reports of any monitoring required by this permit, other than continuous emission or opacity monitors, shall be reported to the Division's Owensboro Regional Office no later than the six-month anniversary date of this permit and every six months thereafter during the life of this permit, unless otherwise stated in this permit. Data from the continuous emission and opacity monitors shall be reported to the Technical Services Branch in accordance with the requirements of Regulation 401 KAR 59:005, General Provisions, Section 3(3). All reports shall be certified by a responsible official pursuant to Section 6(1) of Regulation 401 KAR 50:035, Permits. All deviations from permit requirements shall be clearly identified in the reports.
6. In accordance with Regulation 401 KAR 50:055, Section 1, the owner or operator shall notify the Division for Air Quality's Owensboro Regional Office by telephone as promptly as possible any deviation from permit requirements, including those due to malfunctions, unplanned shutdowns, ensuing startups, or upset conditions. Pursuant to Regulation 401 KAR 50:035, Section 7(1)(e), the notification shall describe the probable cause of the deviations and corrective actions or preventive measures taken.
7. The permittee shall certify compliance with the terms and conditions contained in this permit, annually on the permit issuance anniversary date to the Division for Air Quality's Owensboro Regional Office and the U.S. EPA in accordance with the following requirements:
 - a. Identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status regarding each term or condition of the permit;
 - c. Whether compliance was continuous or intermittent; and
 - d. The method used for determining the compliance status for the source, currently and over the reporting period, pursuant to 401 KAR 50:035, Section 7(1)(c),(d), and (e).
 - e. The certification shall be postmarked by the thirtieth (30) day following the applicable permit issuance anniversary date.
8. In accordance with Regulation 401 KAR 50:035, Section 23, the permittee shall provide the division with all information necessary to determine its subject emissions within thirty (30) days of the date the KEIS emission report is mailed to the permittee.
9. Specific Recordkeeping Requirements #2, #3, and #5 and Specific Reporting Requirements #6 and #7 required by **40 CFR 63, Subpart KK** are intended to convey the requirements of **40 CFR Part 63, Subpart KK**, as applicable to the affected facilities permitted herein. This does not release the permittee of this source from responsibility for any requirements of Subpart KK not specifically stated in this permit.

SECTION G - GENERAL CONDITIONS

(a) General Compliance Requirements

1. The permittee shall comply with all conditions of this permit. A noncompliance shall be (a) violation(s) of state regulation 401 KAR 50:035, Permits, Section 7(3)(d) and is also a violation of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) and is grounds for enforcement action including but not limited to the termination, revocation and reissuance, or revision of this permit.
2. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance, shall not stay any permit condition.
3. This permit may be revised, revoked, reopened and reissued, or terminated for cause. The permit will be reopened for cause and revised accordingly under the following circumstances:
 - a. If additional applicable requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the applicable requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to Regulation 401 KAR 50:035, Section 12(2)(c);
 - b. The Cabinet or the U. S. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.;
 - c. The Cabinet or the U. S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable. Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Division, at least thirty (30) days in advance of the date the permit is to be reopened, except that the Division may provide a shorter time period in the case of an emergency.

4. The permittee shall furnish to the Division, in writing, information that the Division may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.
5. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the permitting authority. The permittee shall also provide additional information as necessary to address any requirement that becomes applicable to the source after the date a complete permit application was submitted but prior to the release of the draft permit.

SECTION G - GENERAL CONDITIONS (CONTINUED)

6. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit.
7. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance.
8. Except as identified as state-origin requirements in this permit, all terms and conditions contained herein shall be enforceable by the United States Environmental Protection Agency and citizens of the United States.
9. This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038, Section 3(6).
10. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance.
11. This permit shall not convey property rights or exclusive privileges.
12. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Kentucky Cabinet for Natural Resources and Environmental Protection or any other federal, state, or local agency.
13. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry.
14. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders.
15. Permit Shield: Except as provided in State Regulation 401 KAR 50:035, Permits, compliance by the affected facilities listed herein with the conditions of this permit shall be deemed to be compliance with all applicable requirements identified in this permit as of the date of issuance of this permit.
16. All previously issued construction and operating permits are hereby null and void.

(b) Permit Expiration and Reapplication Requirements

1. This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division.

SECTION G - GENERAL CONDITIONS (CONTINUED)

(c) Permit Revisions

1. A minor permit revision procedure may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the SIP or in applicable requirements and meet the relevant requirements of Regulation 401 KAR 50:035, Section 15.
2. This permit is not transferable by the permittee. Future owners and operators shall obtain a new permit from the Division for Air Quality. The new permit may be processed as an administrative amendment if no other change in this permit is necessary, and provided that a written agreement containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittee has been submitted to the permitting authority thirty (30) days in advance of the transfer.

(d) Acid Rain Program Requirements

1. If an applicable requirement of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) is more stringent than an applicable requirement promulgated pursuant to Federal Statute 42 USC 7651 through 7651o (Title IV of the Act), both provisions shall apply, and both shall be state and federally enforceable.

(e) Emergency Provisions

1. An emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or other relevant evidence that:
 - a. An emergency occurred and the permittee can identify the cause of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and,
 - d. The permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division within two working days after the time when emission limitations were exceeded due to the emergency. The notice shall meet the requirements of 401 KAR 50:035, Permits, Section 7(1)(e)2, and include a description of the emergency, steps taken to mitigate emissions, and the corrective actions taken. This requirement does not relieve the source of any other local, state or federal notification requirements.
2. Emergency conditions listed in General Condition (e)1 above are in addition to any emergency or upset provision(s) contained in an applicable requirement.
3. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof.

SECTION G - GENERAL CONDITIONS (CONTINUED)

(f) Risk Management Provisions

1. The permittee shall comply with all applicable requirements of 40 CFR Part 68, Risk Management Plan provisions. If required, the permittee shall:
 - a. Submit a Risk Management Plan to U.S.EPA, Region IV with a copy to this Division and comply with the Risk Management Program by June 21, 1999 or a later date specified by the U.S.EPA.
 - b. Submit additional relevant information if requested by the Division or the U.S. EPA.

(g) Ozone depleting substances

1. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
 - a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.166.
 - e. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.
2. If the permittee performs service on motor (fleet) vehicle air conditioners containing ozone-depleting substances, the source shall comply with all applicable requirements as specified in 40 CFR 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

SECTION H - ALTERNATE OPERATING SCENARIOS

N/A

SECTION I - COMPLIANCE SCHEDULE

N/A